

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GREGORY T. ERNST, RONALD
AND LEDA KEYES
Plaintiffs,

OFFICER WILLAM ANDERSON et al
Defendants.

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) No. 02 C 4884
) Judge Darrah
)

FILED

OCT 28 2002

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

**PLAINTIFFS' FORMAL RESPONSE TO DEFENDANTS'
MOTION TO DISMISS CLAIMS OF GREGORY T. ERNST.**

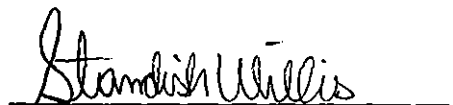
NOW COMES the Plaintiffs, by and through their attorney, The Law Office of Standish E. Willis moving this court to exercise supplemental jurisdiction over the subject matter of plaintiff Ernst's claims. In support of this motion, plaintiffs state:

1. The allegations in Counts VII, VIII and IX of plaintiffs' complaint are made by plaintiff, Gregory Ernst.
2. All of Ernst's claims are based on Illinois Tort Law.
3. The allegations of Counts I-VI of plaintiffs' complaint are made by Ronald and Leda Keyes.
4. Ronald and Leda Keyes, in Counts I-VI of plaintiffs' complaint, allege civil rights violations and state law claims for assault and battery and malicious prosecution arising out of an incident on July 10, 2001 at the Allstate Arena.
5. This court should exercise supplemental jurisdiction over all of Plaintiff Gregory Ernst's state claim Ernst and the Keyes' claims because these claims are part of the same case and controversy pursuant to Section 1367 of Title 28 of the United States Code.
6. Plaintiff Ernst is properly joined to this action under Rule 20(a) of the Federal Rules of Civil Procedure.
7. Plaintiff Ernst's state claims arise out of the same occurrence or series of occurrences as Plaintiffs Ronald and Leda Keyes federal claims. Moreover, Plaintiff Ernst is claims and the Keyes' claims present common questions of fact.

8. Because Plaintiff Ernst's claims are part of the same case and controversy as the Keyes' claims and he is properly joined to this action, this court should exercise supplemental over Ernst's claims pursuant to Section 1367.
9. The plaintiffs have previously submitted a Memorandum in support of their position.

WHEREFORE, the Plaintiffs respectfully urge this court to deny defendants Motion to Dismiss.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Standish Willis", is written over a horizontal line.

Standish E. Willis
Teniece Guy

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